

**UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE,

Plaintiff,

v.

**WARREN & BARAM MANAGEMENT
LLC,**

Defendant.

Case No. 1:20-cv-09522-ER/DCF

DECLARATION OF ADAM J. LEVITT

I, Adam J. Levitt, pursuant to 28 U.S.C. § 1746 and in support of Plaintiff Jane Doe's Order to Show Cause, declare as follows, under penalty of perjury:

1. I am a founding partner of DiCello Levitt Gutzler LLC, Plaintiff's counsel of record in this action. I am a member in good standing of the State Bar of New York, and I have been admitted to practice in the United States District Court for the Southern District of New York. I have not entered an appearance in this action.

2. I have personal knowledge of the facts stated herein, and, if called upon to do so, could and would testify competently thereto.

3. Earlier today, I received approximately fourteen (14) notifications that Jonathan Baram had commented on several posts on my personal Facebook page. *See* Exhibits B and C attached hereto.

4. Upon further investigation, I learned that Baram, acting on behalf of Defendant Warren & Baram Management LLC, had commented on those posts on my personal Facebook page by posting a photo from Defendant's website, "warrenandbaram.com," that falsely accused DiCello Levitt Gutzler of having "unclean hands." *See* Exhibit D attached hereto.

5. Baram also commented on several posts on my personal Facebook page with a second photo from “warrenandbaram.com” that appears to be a review from a non-client that stated:

Quit being ‘ambulance chasers’ in the midst of the National Emergency. I got an email from them today. I have never done business with them or even heard of them. So they are “cold calling” via email to drum up business. What a shame at this time. They should try to be part of the solution instead of just creating more problems.

See Exhibits E, F, and G attached hereto.

6. By virtue of Mr. Baram’s posts on my personal Facebook page, other people who were either tagged in, or had previously commented on, the original posts were notified of the inappropriate photo comments from Baram and from Warren & Baram Management LLC.

7. Mr. Baram’s abusive conduct in posting his scurrilous, defamatory, inflammatory, and false information on my personal Facebook page is evidence that further supports the relief that Plaintiff presently seeks here, including sanctions and a temporary restraining order prohibiting Mr. Baram and his company, Warren & Baram Management LLC, from continuing his barrage of retaliatory and obscene threats.



Adam J. Levitt